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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MAC WILLIAM BISHOP and CHRISTOPHER
CHIVERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,

Defendant.

13 Civ. 8620 (GWG)

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Declaration of Laurence E. Castelli and all exhibits attached thereto, Defendant the United States Department of Homeland Security (“DHS”), by and through its attorney, Preet Bharara, United States Attorney for the Southern District of New York, will move this Court before the Honorable Gabriel W. Gorenstein, United States Magistrate Judge, United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time as the Court may direct, for an order granting summary judgment to DHS on all claims in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court’s order dated March 10, 2014, Plaintiff’s answering papers, if any, must be served upon the United States Attorney’s

Office, Southern District of New York, 86 Chambers Street, 3rd Floor, New York, New York 10007, no later than May 12, 2014, or as otherwise permitted by Paragraph 2.B of the Court's Individual Practices.

Dated: New York, New York
April 21, 2014

PREET BHARARA
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